

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

Civil Action No. 2:22-cv-547(MJH)

Plaintiff,

The Honorable Marilyn J. Horan

v.

**MICHAEL RUSSIN, RUSSIN
FINANCIAL, RUSSIN GROUP, SIMON
ARIAS, III, ARIAS AGENCIES, S.A.
ARIAS HOLDINGS, LLC, AMERICAN
INCOME LIFE INSURANCE COMPANY,**

ELECTRONICALLY FILED

Defendants.

**DECLARATION OF JAMES A. UNGER IN SUPPORT OF
AMERICAN INCOME LIFE INSURANCE COMPANY'S
RESPONSE TO PLAINTIFF'S SUR-REPLY**

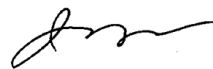
James A. Unger, under the pains and penalties of perjury, states:

1. I am an attorney at King & Spalding LLP, counsel for Defendant American Income Life Insurance Company ("AIL") in the above-referenced matter. I am admitted to practice in California and admitted Pro Hac Vice in this matter. I submit this declaration in support of AIL's Response to Plaintiff's Order and Sur-Reply. I have personal knowledge of the facts stated herein, and could and would testify competently thereto if called as a witness in this matter.

2. On Sunday, March 3, 2024—the day before the arbitration hearing was scheduled to commence—counsel for Plaintiff sent an email to counsel for all parties, as well as the arbitration Panel, purporting to withdraw her claims. As of that date: (i) AIL had filed an answer on December 5, 2022, to Plaintiff's arbitration demand; (ii) the other respondents had also answered Plaintiff's arbitration demand; (iii) discovery in the arbitration had been completed; (iv) respondents had moved for summary judgment; and (v) the Panel had granted summary judgment against Plaintiff as to numerous of her claims.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

This declaration was signed on April 3, 2024 in Los Angeles, California.

A handwritten signature in black ink, appearing to read 'James A. Unger', written in a cursive style.

James A. Unger